

1 MARC P. COOK  
State Bar No. 004574  
2 GEORGE P. KELESIS  
State Bar No. 000069  
3 COOK & KELESIS, LTD.  
517 S. Ninth Street  
4 Las Vegas, Nevada 89101  
Telephone: 702-737-7702  
5 Facsimile: 702-737-7712  
6 Email: mcook@bckltd.com  
7 *Attorneys for Defendants Super Structures Inc., dba Super Structures;  
Super Structures, Inc., dba Super Structures; Tracey Reynolds,  
Robert Reynolds, Western National Mutual Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11     BOARD OF TRUSTEES OF THE  
12     PAINTERS AND FLOORCOVERERS  
      JOINT COMMITTEE; *et al.*.

**Plaintiffs**

14 SUPER STRUCTURES INC., a Nevada  
15 corporation dba SUPER STRUCTURES;  
SUPER STRUCTURES, INC., et al..

#### Defendants.

CASE NO. 2:18-CV-01364-GMN-EJY

**JOINT MOTION TO EXTEND  
DEADLINES TO FILE OPPOSITION  
& REPLY TO MOTION TO  
RECONSIDER, REPLY TO  
OPPOSITION TO ATTORNEY'S  
FEES MOTION AND JOINT PRE-  
TRIAL ORDER**

COMES NOW, Defendants Super Structures, Inc. and Super Structures Inc. (“Super Structures”) by and through their counsel of record, Marc P. Cook, Esq., of the law firm of Cook & Kelesis, Ltd., and Plaintiffs Board of Trustees of the Painters and Floor Coverers Joint Committee, et al. (“Plaintiffs”), by and through their counsel of record, Christensen James & Martin, Chtd. and pursuant to LR IA 6.1, hereby jointly move and request this Court to extend several deadlines as follows.

## **POINTS AND AUTHORITIES**

On November 30, 2020, this Court entered its Order (ECF No. 62) granting Plaintiffs' Motion for Summary Judgment against Defendants Super Structures, denying Defendants' Motion for Summary Judgment, denying as moot Plaintiffs' Motion to Strike and denying as moot Defendants' Motion for Leave to File Excess Pages ("Summary Judgment Order"). The Summary

1 Judgment Order set deadlines for the filing of a Status Report and a Joint Pretrial Order. On  
 2 December 14, 2020, Plaintiffs filed a Motion for Award of Attorney's Fees and Costs Against  
 3 Judgment Debtors Super Structures, Inc. and Super Structures Inc. (ECF No. 63) ("Attorney's Fees  
 4 Motion") based on this Court's Summary Judgment Order. Defendants have filed their Motion to  
 5 Reconsider this Court's Summary Judgment Order (ECF No. 72) and their Opposition to Plaintiff's  
 6 Motion for Award of Attorney's Fees and Costs (ECF No. 71) on January 26, 2021. The parties  
 7 request that this Court extend the deadlines for thirty (30) days on the reply to opposition to the  
 8 Attorney's Fees Motion, the opposition and reply to the Motion to Reconsider this Court's Order and  
 9 for the filing of the Joint Pretrial Order. The Status Report has already been submitted by Plaintiffs  
 10 on January 11, 2021 (ECF No. 68). Good cause exists to extend the time because Plaintiffs' and  
 11 Defendants' attorneys are efforting to discuss possible resolutions. The requested extension will  
 12 provide the parties with more opportunity to prepare and submit their pleadings. This is the third  
 13 stipulation to extend the time by which the parties must file or answer the respective pleadings.

14       This will affect the schedule as follows:

15 <b>EVENT</b>	16 <b>CURRENT DEADLINE</b>	17 <b>PROPOSED DEADLINE</b>
16           Opposition to Motion to Reconsider	17           February 8, 2021	18           March 8, 2021
17           Reply to Opposition to Motion to Reconsider	18           February 15, 2021	19           March 15, 2021
18           Reply to Opposition to Attorney's Fees Motion	19           February 1, 2021	20           March 1, 2021
19           Joint Pretrial Order	20           January 27, 2021	21           March 1, 2021

21        This request for an extension of time is not sought for any improper purpose or other purpose  
 22 of delay.

23        The parties respectfully submit that the reasons set forth above constitute good cause for the  
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1 extension and deadlines requested above.

2 **IT IS SO STIPULATED.**

3 DATED this 27<sup>th</sup> day of January, 2021.

4 COOK & KELESIS, LTD.

CHRISTENSEN JAMES & MARTIN

5  
6 By: /s/ Marc P. Cook  
7 Marc P. Cook, Esq.  
8 Nevada Bar No. 4574  
9 517 S. Ninth Street  
Las Vegas, Nevada 89101  
*Attorneys for Defendants*

By: /s/ Wesley J. Smith  
Wesley J. Smith, Esq.  
Nevada Bar No. 11871  
7440 W. Sahara Avenue  
Las Vegas, Nevada 89117  
*Attorneys for Plaintiffs*

10  
11 **IT IS SO ORDERED:**

12   
13 United States Magistrate Judge

14 Dated: January 27, 2021

15 Submitted by:

16 COOK & KELESIS, LTD.

17 By: /s/ Marc P. Cook  
18 Marc P. Cook, Esq.  
19 *Attorneys for Defendants*

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